

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 04-10036-MEL
)
DANA ROWELL,)
)
 Defendant.)

JOINT INITIAL STATUS MEMORANDUM

Pursuant to Local Rule 116.5, the parties hereby submit this Joint Memorandum to address issues relative to the progress of this case.

1. The parties do not seek relief from applicable timing requirements imposed by the local rule.
2. The parties do not seek discovery concerning any expert witnesses, pursuant to Fed. R. Crim. P. 16(a)(1)(E).
3. Although the government has provided to the defendant all documents and other discoverable materials in this case pursuant to automatic discovery, the government may receive additional discoverable information, which it will turn over to the defense. Additionally, the defendant does not presently have any discoverable information, but pursuant to their agreement to provide reciprocal discovery, will provide the government with any such information received in the future.
4. The defendant does not intend to file any dispositive motions in this case at this time.
5. The parties, therefore, request that the period between April 5, 2004 and the date of the Final Status Conference be excluded under the Speedy Trial.
6. There have been preliminary discussions between the parties regarding the possibility of an early resolution of the case, but additional time is necessary to conclude those discussions. The parties anticipate that this case will be resolved by plea agreement.
7. The parties request that the Final Status Conference be scheduled for sometime in early May, 2004, to allow the

parties sufficient time to complete plea negotiations.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

DANA ROWELL
Defendant

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